

UNITED STATES DISTRICT COURT

FEDERAL TRADE COMMISSION,

Plaintiff,

V.

SAFE HARBOUR FOUNDATION OF FLORIDA,

INC., a Florida corporation, *et al.*,

Defendants.

FTC'S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff, the Federal Trade Commission (“FTC” or “the Commission”), moves for an

order preliminarily enjoining the defendants, Safe Harbour Foundation of Florida, Inc.,

Silverstone Lending, LLC, Silverstone Financial LLC, Keystone Financial, LLC, Southeast

Advertising, Inc., MT25 LLC, Peter J. Porcelli, II, Bonnie A. Harris, and Christopher Tomasulo,

from continuing to harm consumers through their mortgage foreclosure rescue scheme. As

detailed in the attached memorandum, the defendants' operations violate the Truth in Lending

Act (“TILA”), 15 U.S.C. §§ 1601-1666j (including the Home Ownership and Equity Protection

Act of 1994 (“HOEPA”), 15 U.S.C. § 1639), an implementing regulation of TILA entitled

Regulation Z, 12 C.F.R. Part 226, and Section 5(a) of the Federal Trade Commission Act (“FTC

Act”), 15 U.S.C. § 45(a).

WHEREFORE, the Federal Trade Commission respectfully requests that the Court grant

the FTC's motion for preliminary injunction and enter an order enjoining the defendants from

taking any further actions in violation of law or continuing to damage their victims. A

memorandum in support, and a proposed order accompany this motion.

Respectfully Submitted,

WILLIAM BLUMENTHAL
General Counsel

DATE: August 14, 2008

/s/ David A. O'Toole
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